

Appln No. 09/788,069

Amdt date August 12, 2004

Reply to Office action of March 12, 2004

REMARKS/ARGUMENTS

Claims 1-37 are pending. Applicants respectfully request reexamination, reconsideration and allowance of this application.

The Examiner has rejected claims 1-37 under 35 U.S.C. Section 103(a) as being unpatentable over Leon, U.S. Patent 6,424,954 in view of Cordery et al, which the Examiner noted as U.S. patent 5,953,247, but which does not correspond to a patent on which Cordery et al are inventors. Applicants believe that the Examiner may have meant to cite to U.S. Patent 5,953,427, but mistakenly transposed the last three numbers of the Cordery et al. patent. If Applicants are incorrect in their belief, then they respectfully request clarification of the same.

Applicants respectfully request that the rejection be withdrawn. The claimed invention is not disclosed by Leon or Whitehouse. Leon is of the category of specialized hardware-based systems located at the user's site. Leon's system teaches a dedicated postage metering system (SMD) connected to the user's computer as an external hardware device or circuit card that is portable. The SMD couples to the personal computer via a communications link 122 that can be a serial link such as an RS-232 interface. By carefully partitioning the various features of the metering system, Leon teaches that the SMD can be manufactured in a relatively small size and low cost unit. See Leon, col. 2, lines 29-40, col. 3, line 61- col. 4, line 20, FIGs. 1A and 1B. In Leon's system, each SMD performs state functions. See Leon, cols. 9, 10. Accordingly, in Leon's

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system, depending on the number of users, there may be thousands of individual localized SMDs attached to each user's PC.

The Cordery reference discloses an electronic data interchange postage evidencing system. As admitted by the Examiner beginning on page 3, line 2 of the Office Action, "Leon fails to teach an inventive concept including a stateless cryptomodule and a plurality of user computer in communication with the cryptomodule to communication [sic] digital signature." The Examiner then cites to Cordery et al., at column 7, line through column 8, line 19, as disclosing the stateless cryptomodules. Applicants, however, have been unable to find such a disclosure at the location cited by the Examiner and respectfully request clarification of the same. Further, Applicants have found, and can see, no motivation to combine the teachings of Leon, which focus on individual SMDs, and the teachings of Cordery et al, which focuses on an electronic data interchange. Even if the references were somehow combined, claimed elements of Applicants' inventions would still be missing. Therefore, the relied-upon references do not support a rejection under Section 103, and the rejection should be withdrawn.

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Based on the foregoing, Applicants respectfully request allowance of claims 1-37 and early issuance of a Notice of Allowance. If any issues remain unresolved that would preclude allowance of this application, then Applicants respectfully ask that the Examiner contact the undersigned to resolve any issues by telephonic interview.

Respectfully submitted,
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